

# ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

ORIGINAL  
FILE

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RM - 8066

In the Matter of

Request for Amendment of the )  
Commission's Rules to Enable )  
Use of Line 21, Field 2, for )  
Closed Captions and Data Services )

**COMMENTS OF THE  
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters ("NAB")<sup>1</sup> submits herewith its comments in response to the above-captioned Petition for Rule Making ("Petition")<sup>2</sup> filed by the Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG").

EIA/CEG has asked the Commission to commence a rulemaking proceeding to allow for the placement of closed caption and other data services on field 2 of line 21 in the vertical blanking interval of the NTSC television signal. In its petition, EIA/CEG asks the Commission to amend Section 73.682(a)(22)(i) of the Commission's Rules which currently restricts the placement of closed caption data to line 21, field 1 and only the first half of line

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<sup>1</sup> NAB is a nonprofit incorporated association which serves and represents America's radio and television stations and all the major broadcast networks.

<sup>2</sup> See Public Notice, Report No. 1904, released August 25, 1992.

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21, field 2.<sup>3</sup> EIA/CEG asserts that allowing caption data to be placed on all of line 21, field 2 would result in improved service for all consumers, including those with hearing impairments.<sup>4</sup>

EIA/CEG also asks the Commission to remove references to the obsolete and outdated closed caption framing and reference signals now contained in the rules. Specifically, EIA/CEG recommends that the Commission delete Sections 73.682(a)(22)(i)(A), 73.682(a)(22)(i)(C) and figures 17B and 17C of Section 73.699,<sup>5</sup> asserting that these framing and reference signals have never been used to support captioning services, and thus the relevant rule provisions and figures are now no longer needed.<sup>6</sup>

NAB believes the Commission should initiate a rulemaking proceeding that investigates extending closed caption data to line 21, field 2. In addition, removing Sections 73.682(a)(22)(i)(A), 73.682(a)(22)(i)(C) and their associated figures in Section 73.699 will have no effect on TV transmission. Accordingly, in the course of an appropriate line 21 proceeding, NAB would have no objection to Commission proposals for deleting those sections of the rules pertaining to the closed captioning reference pulse and framing code.

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<sup>3</sup> See 47 C.F.R. §73.682(a)(22)(i) (1991).

<sup>4</sup> Petition at 1.

<sup>5</sup> See 47 C.F.R. §73.682(a)(22)(i)(A) and §73.682(a)(22)(i)(C); See also 47 C.F.R. §73.699, figures 17B and 17C (Contains the technical drawings for the signals described in §73.682(a)(22)(i)(A) and §73.682(a)(22)(i)(C)).

<sup>6</sup> Petition at 6.

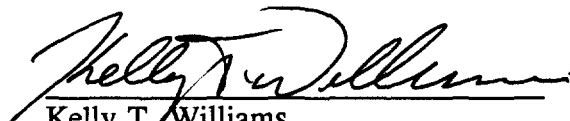
NAB supports the commencement of a rulemaking proceeding in response to EIA/CEG's Petition. NAB looks forward to reviewing the comments filed by interested parties and to the forthcoming Commission Notice of Proposed Rule Making.

Respectfully submitted,

NATIONAL ASSOCIATION OF  
BROADCASTERS  
1771 N Street, N.W.  
Washington, D.C. 20036



Michael C. Rau  
Senior Vice President,  
Science and Technology



Kelly T. Williams  
Manager, Television  
Engineering

Barry D. Umansky  
Deputy General Counsel

September 24, 1992

**CERTIFICATE OF SERVICE**

I, Bridgette DeHart, do hereby certify that a true and correct copy of the foregoing "Comments of the National Association of Broadcasters" was sent by first Class mail, on this 24th day of September, to the following:

George A. Hanover  
Staff Vice President, Engineering  
Consumer Electronics Group  
Electronic Industries Association  
2001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20036

Roy J. Stewart, Esq.  
Chief, Mass Media Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Room 314  
Washington, D.C. 20554

William Hassinger  
Assistant Chief Engineering, Mass Media Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Room 314  
Washington, D.C. 20554

Clay Pendarvis  
Chief, Television Branch  
Federal Communications Commission  
1919 M Street, N.W.  
Room 700  
Washington, D.C. 20554

  
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Bridgette DeHart